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March 31, 2022

**Via ECF**

Hon. Vernon S. Broderick, U.S.D.J.  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 415  
New York, New York 10007

Re: *Jane Doe v. Related Companies LLP, et al.*, Case No. 1:22-cv-01738-VSB

Dear Judge Broderick,

We represent The Related Companies, L.P., Bridge Land West LLC, Stephen M. Ross, Bruce Beal, Jr., Jeff T. Blau, Kenneth Wang, Michael Harrington, Bonita Chung, Michael Hillier, Ivan Marchuk, Alexis Polanco, and Angel Cortes (collectively, the “Defendants”) in the above-referenced matter. We write to request an extension of time, to April 21, 2022, to respond to the Complaint.

This suit is a frivolous attempt by Plaintiff to retaliate for Defendant Bridge Land West’s suit against her. Bridge Land West, Plaintiff’s landlord, originally filed suit in May 2021, but the suit was stayed; on January 21, 2022, Bridge Land West moved to restore it to the court’s docket and to recover from Plaintiff over \$75,000 in unpaid rent and fees. In March 2022, just over one month later, Plaintiff filed this lawsuit seeking \$150 million in damages against, among others, Bridge Land West, The Related Companies (which has a minority membership interest in Bridge Land West), and numerous of Related’s senior executives, claiming harassment and discrimination by various building personnel.

Plaintiff purported to serve all Defendants by leaving copies of the Summons and Complaint at the address of the two entity Defendants on March 15, 2022. Without conceding any defenses regarding the sufficiency of service of process as to any or all Defendants, Defendants’ response is therefore due by April 5, 2022.

Plaintiff’s claims are wholly without merit, and Defendants anticipate filing a motion to dismiss with respect to some or all of the claims and defendants. To avoid the waste of resources that such motion practice will necessarily entail, however, we sought Plaintiff’s consent to seek a settlement conference with the Court. We have not received any response.

Our firm has only recently been retained in this matter, and we seek additional time to familiarize ourselves with the facts so that we may properly respond to the allegations. We sought Plaintiff’s consent, by telephone and email, to our extension request, but she denied it. She did not provide

a reason for her denial. Defendants therefore respectfully request an extension of time to April 21, 2022, to respond to the Complaint. No prior such requests have been made.

Respectfully submitted,

*/s/ Georgia K. Winston*

Georgia K. Winston

cc: Plaintiff Jane Doe (via U.S. Mail and ECF)